

June 9, 2014

Letter of Appeal  
Ms. Marlene H. Dortch  
Federal Communication Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: In the Matter of Request for Review of the Universal Service Administrator, Schools  
and Libraries Universal Service Support Mechanism.  
CC Docket No.02-6

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In re: Community Partnership of Madera  
Billed Entity Number: 16051127  
Appellant: E rate Solutions Group  
Fund Year: 2013 FCC Form 471:880246

Decision Letter Date April 10, 2014  
Appeal Postmark Date May 1, 2014

And

Decision Letter Date April 11, 2014  
Appeal Postmark Date May 3, 2014

This is a "Letter of Appeal" for Form 471 Application 880246 with associated FRN's:  
2401224, 2401237, 2401238, 2401242, 2401243, 2401245

BEN and contact information:

Appellant Name:

Katherine Weiss, Authorized Representative  
Email: kweiss@erategroup.com  
Phone: 732-946-8300  
Fax: 732-879-0400

Applicant Name & BEN:

Name: **Community Partnership of Madera**  
BEN: **16051127**

471 Reference & Funding Year:

Form 471: 880246

Funding Year: 2013

471 – 880246

FRN Information:

Funding Request Number: 2401224

Service Provider: Pacific Bell

SPIN: 143002665

471 – 880246

FRN Information:

Funding Request Number: 2401237

Service Provider: Verizon Wireless

SPIN: 143002665

471 – 880246

FRN Information:

Funding Request Number: 2401238

Service Provider: Comcast

SPIN: 143003990

471 – 880246

FRN Information:

Funding Request Number: 2401242

Service Provider: Sierra

SPIN: 143009677

471 – 880246

FRN Information:

Funding Request Number: 2401243

Service Provider: The Works

SPIN: 143018227

471 – 880246

FRN Information:

Funding Request Number: 2401245

Service Provider: Verizon

SPIN: 143004769

Dear Ms. Dortch:

On March 14, 2014 a response to Appeals Reviewer was sent by the applicant's authorized consultant – see Exhibit I - 2013 App 880246. On March 17, 2014, See Exhibit II, a request to have Appeals Reviewer call us was sent. During the call it was discussed that the response provided was the same that was provided for this applicant

in 2010 (App 729314), 2011 (App 783100 & 783101) and 2012 (App 835512) which was also sent by the applicant's authorized consultant and subsequently approved. In addition in support of this inconsistency, it was pointed out that for the last five years, which included 2013, the practice of a consultant providing these responses was standard practice that was accepted and approved without exemption for hundreds of similar schools/Head Starts each year as referenced by Apps 882666, 882564 & 882385. On March 18, 2014 a response was provided to Appeals Reviewer – See Exhibit III which contained certifications from Call State E Rate Coordinator and the applicant CFO Donna Tooley stating responses to requested information. On March 21, 2014 a request was sent to Appeals Reviewer – see Exhibit 4, to modify Block 4 which should have generated a new letter request. Appeals Reviewer never complied with this request. On March 21, 2014 – see Exhibit V, applicant confirmed requested information based upon the revisions sent via Exhibit IV. Exhibit V was not sent to Appeals Reviewer as we were waiting for an updated letter which would be consistent with applicant's response. As a further example of the inconsistent review procedures, App 948328 – 2014, was approved based upon using information from prior year's application to satisfy the standard Head Start questions.

Please instruct USAC to reconsider the appeal of App 880246 based upon the following:

- 1) Appeals Review procedures were inconsistent with standard PIA procedures that have been followed for Funding Years 2013 and prior.
- 2) Appeals Reviewer never responded to request to modify Block 4 so that applicant's letter could be submitted which all occurred prior to the denial.
- 3) Applicant and State E Rate Coordinator did not validate entities directly with Appeals reviewer prior to denial which should have resulted in at least a partial approval.
- 4) Requests were made to General Manager – Frank Jones – see exhibit VI showing request to discuss inconsistent review procedures for Head Start applications which was never responded.
- 5) A request for reconsideration was sent to General Manager – Frank Jones where it was discovered that inconsistent review procedures were followed by reviewers for all Head Start applications – See Exhibit VII for three examples of acceptance of answers to Head Start questions from consultants by three different PIA reviewers which resulted in application approvals proving that this was standard procedure.
- 6) Appeal containing new information required for approval was submitted on 5/1/14 – Case 22-631757. In addition Appeal also containing new information required for approval was submitted on 5/3/14 – Case 22-632365 appealing USAC

decision issued on 4/11/2014. Note appeal letter stated that this decision could be appealed to the FCC or USAC.

A reversal of the denial of this funding request or reconsideration is sought. I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any procedural inconsistencies or delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,  
*Katherine M. Weiss*  
Consultant

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# Exhibit I

Subject: Re: Information Request 3-13-14 Community Partnership of Madera – 880246  
From: Katherine M. Weiss (kweiss@erategroup.com)  
To: Gary.TARANTINO@sl.universalservice.org;  
Bcc: kweiss@erategroup.com;  
Date: Friday, March 14, 2014 8:21 AM

## ANSWERS BELOW

### Issue

Based on the review of your Funding Year **2013** FCC Form 471 application **880246**, we have determined that the entities listed below that are included in your request for services appear to be Head Start facilities. In your state, facilities dedicated to Head Start instruction are eligible for funding. However, services for children under the age of **three** are not eligible for discounts in your state.

For further information regarding Head Start facilities, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/non-traditional/default.aspx>.

Listed below are the Head Start facilities:

JULIA A LOPEZ CCDC – SAN PALOS HEAD START
<b>Entity</b>
SOUTH DOS PALOS HEAD START
Casas De La Vina Sunset Head Start
CHOWCHILLA HEAD START
COTTONWOOD HEAD START
EASTSIDE
FAIRMEAD HEAD START
MARIPOSA HEAD START
MIS TESOROS HEAD START
NORTH FORK HEAD START
OAKHURST HEAD START
RUTH GONZALES HEAD START
VALLEY WEST HEAD START
VERDELL MCKELVEY HEAD START
BIOLA MIGRANT HEAD START
FIREBAUGH MIGRANT HEAD START
FIVE POINTS MIGRANT HEAD START
HURON MIGRANT HEAD START
MEDNOTA MIGRANT HEAD START
ORANGE COVE MIGRANT HEAD START
PARLIER MIGRANT HEAD START
SELMA MIGRANT HEAD START
ALPHA HEAD START
EASTIN ARCOLA HEAD START

JULIA A LOPEZ CCDC – SAN PALOS HEAD START
POMONA HEAD START
SIERRA VISTA HEAD START
LOS NINOS HEAD START
REEDLEY MIGRANT AND SEASONAL HEAD START
MIS ANGELITOS
RAFAEL SILVA MIGRANT HEAD START
MOUNTAIN HEAD START

#### Questions

**PLEASE NOTE: We need a response for each of the schools listed above. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.**

To assist us in the review of your application, we need the following information regarding services for children under the age of 3

To assist us in the review of your application, we need the following information regarding services for children under the age of **three**:

1. Does the facility(ies) listed above include Head Start students? **YES**
  - a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Facility**
2. Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.
  - a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under 3**
  - b. If Yes, provide the enrollment count of students under the age of 3.
3. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See Block 4/5**
4. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See Block 4/5**
  - a. Identify the ineligible student cost (students under the age of 3)
  - b. Identify the eligible student cost
5. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.

Let me know if you need anything else.

Katherine M. Weiss  
 E Rate Solutions Group  
 Phone - 732.946.8300 Fax - 888.429.5749  
[www.erategroup.com](http://www.erategroup.com)

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**From:** "Tarantino, Gary" <Gary.TARANTINO@sl.universalservice.org>  
**To:** "kweiss@erategroup.com" <kweiss@erategroup.com>; "; " <IMCEAFAX-Katherine+20Weiss+20+40+201-732-879-0400@solixinc.com>  
**Sent:** Thursday, March 13, 2014 12:27 PM  
**Subject:** Information Request 3-13-14 Community Partnership of Madera - 880246

Ms. Katherine Weiss:  
Katherine,

Please read and respond to the attached information request. Thank you in advance for your response.

Regards,

Gary Tarantino  
Appeals Reviewer  
USAC Schools and Libraries Division  
30 Lanidex Plaza West  
Parsippany, NJ 07054  
Phone: 973-581-5065  
Fax: 973-599-6506  
[gary.tarantino@sl.universalservice.org](mailto:gary.tarantino@sl.universalservice.org)

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# Exhibit II

**Subject:** Re: Incomplete Response – Community Partnership of madera – 880246  
**From:** Katherine M. Weiss (kweiss@erategroup.com)  
**To:** Gary.TARANTINO@sl.universalservice.org;  
**Date:** Monday, March 17, 2014 10:55 AM

Please call me

Joseph J. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 732.946.8399  
[www.erategroup.com](http://www.erategroup.com)

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**From:** "Tarantino, Gary" <Gary.TARANTINO@sl.universalservice.org>  
**To:** "Katherine Weiss @ 1-732-879-0400" <IMCEAFAX-Katherine+20Weiss+20+40+201-732-879-0400@solixinc.com>; "kweiss@erategroup.com" <kweiss@erategroup.com>  
**Sent:** Monday, March 17, 2014 10:44 AM  
**Subject:** Incomplete Response - Community Partnership of madera - 880246

Katherine Weiss,

Please read and respond to the attached Incomplete Response Information Request. Please note the responses for each of the schools need to come from a school official – they must be signed and dated.

Regards,

Gary Tarantino  
Appeals Reviewer  
USAC Schools and Libraries Division  
30 Lanidex Plaza West  
Parsippany, NJ 07054  
Phone: 973-581-5065  
Fax: 973-599-6506  
[gary.tarantino@sl.universalservice.org](mailto:gary.tarantino@sl.universalservice.org)

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# Exhibit III

**Subject:** Fw: E-rate Application Number: 880246 – COMMUNITY PARTNERSHIP OF MADERA REMINDER  
**From:** Joseph Weiss (jweiss@erategroup.com)  
**To:** TARANTINO@sl.universalservice.org;  
**Date:** Tuesday, March 18, 2014 2:25 PM

Joseph J. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 732.946.8399  
[www.erategroup.com](http://www.erategroup.com)

----- Forwarded Message -----

**From:** E-RATE <E-RATE@cde.ca.gov>  
**To:** "jhong@sl.universalservice.org" <jhong@sl.universalservice.org>  
**Cc:** Joseph Weiss <jweiss@erategroup.com>; E-RATE <E-RATE@cde.ca.gov>  
**Sent:** Thursday, March 6, 2014 4:33 PM  
**Subject:** RE: E-rate Application Number: 880246 - COMMUNITY PARTNERSHIP OF MADERA REMINDER

Jing Hong  
Associate Manager, Program Integrity Assurance  
30 Lanidex Plaza West | Parsippany, NJ 07054  
T: 973.581.6702 | F: 973.599.6538  
[jhong@sl.universalservice.org](mailto:jhong@sl.universalservice.org)

My office has been requested to validate the E-rate eligibility of [COMMUNITY PARTNERSHIP OF MADERA] and discounts for several school sites operated by the COMMUNITY PARTNERSHIP OF MADERA.

The attached February 27, 2014 certification letter, certifies that the listed district sites meet the statutory definition of a school as found in the No Child Left Behind Act of 2001, (20 U.S.C., section 7801(18) and (38)), and/or the definition of non-traditional K-12 students and facilities as found in the "Eligibility Table for Non-traditional K-12 Students and Facilities" on the Schools and Libraries Division (SLD), Universal Service Administrative Company's (USAC) Web site.

In addition, the attached certification letter provides enrollment and the number of students eligible for the National School Lunch Program (NSLP) for the district school sites. The letter also certifies that documentation for this student data is maintained in official district records.

Based on the attached certification letter and research done by this office, we conclude that the [COMMUNITY PARTNERSHIP OF MADERA] is eligible for E-rate in California under E-rate program guidelines and that the student data (student enrollment and NSLP student eligibility) and the resulting discounts are accurate and supported by documentation maintained in official records. Please contact me if our office may be of further assistance to you and your team.

Sincerely,

Doris Stephen  
State E-rate Coordinator  
California Department of Education

1430 N Street, Suite 6308  
Sacramento, CA 95814  
916-324-9943  
[e-rate@cde.ca.gov](mailto:e-rate@cde.ca.gov)

**From:** Joseph Weiss [mailto:jweiss@erategroup.com]  
**Sent:** Wednesday, March 05, 2014 5:04 PM  
**To:** E-RATE  
**Subject:** Fw: E-rate Application Number: 880246 - COMMUNITY PARTNERSHIP OF MADERA REMINDER

Please validate the enclosed entities ASAP - PIA response below

Joseph J. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 732.946.8399  
[www.erategroup.com](http://www.erategroup.com)

----- Forwarded Message -----

**From:** Katherine M. Weiss <kweiss@erategroup.com>  
**To:** "Hong, Jing" <Jing.Hong@sl.universalservice.org>  
**Sent:** Thursday, February 27, 2014 10:04 AM  
**Subject:** Re: E-rate Application Number: 880246 - COMMUNITY PARTNERSHIP OF MADERA REMINDER

ANSWERS BELOW

#### **I. Eligibility of the Entities**

##### *I. Issue*

Based on the review of your Funding Year **2013** FCC Form 471 application **880246** and/or the documentation that you have provided, we were not able to determine the eligibility of your school entity, **JULIA A LOPEZ CCDC - SAN PALOS HEAD START (16074147), RAFAEL SILVA MIGRANT HEAD START (16074153) and MOUNTAIN HEAD START (16074514)**. Eligible schools must meet the statutory definition of an elementary or secondary school found in the No Child Left Behind Act of 2001 (20 U.S.C. Section 7801 (18) and (38)) and they must not be operating as for-profit businesses, and may not have an endowment exceeding \$50 million.

For additional information on eligibility requirements, see: Before You Begin Eligibility – <http://www.usac.org/sl/applicants/beforeyoubegin/default.aspx>.

##### *Question*

Please provide any documentation that will verify that the entity meets the statutory definition provided above of an elementary or secondary school.

#### **PLEASE PROVIDE AN EXTENSION TO RECEIVE DOE INFORMATION**

##### *II. Issue*

Based on the review of your Funding Year **2013** FCC Form 471 application **880246**, we have determined that the entity(ies) listed below that are included in your request for services appear to be Head Start facility(ies).



February 27, 2014

Larry Hiuga  
State E Rate Coordinator  
California Department of Education  
1430 N Street, Suite 6308  
Sacramento, CA 95814

Dear Larry:

I certify that Entities – **RAFAEL SILVA MIGRANT HEAD START (16074153)** located at 18926 HENRY MILLER RD, Los Banos, CA 93635 and **MOUNTAIN HEAD START 16074514** located at 33087 ROAD 228, North Fork, CA 93643 is operated by Community Partnership Of Madera and meets the statutory definition of an elementary school found in the No Child Left Behind Act of 2001 (20 U.S.C. section 7801 (18) and (38), and/or the Eligibility Table for Non-traditional K-12 Students and Facilities as found on the Schools and Libraries Division (SLD), Universal Service Administrative Company (USAC) web site.

I certify that all information contained in this letter and attachment is true and accurate and supported by written documentation maintained in Community Action Partnership of Madera County's official records.

Thank you for your attention to this matter. If you have questions, please contact me.

Sincerely,

Donna S. Tooley  
Chief Financial Officer

# Exhibit IV

**From:** Katherine M. Weiss <kweiss@erategroup.com>  
**To:** "Tarantino, Gary" <Gary.TARANTINO@sl.universalservice.org>  
**Sent:** Friday, March 21, 2014 6:27 PM  
**Subject:** Re: Incomplete Response - Community Partnership of madera – 880246

Please adjust BLOCK 4 as listed below - please confirm

1. Name of School: <del>ALPHA HEAD START</del> <b>DELETE SITE <u>NOT RECEIVING SERVICE</u></b>	
2. Entity Number: 16054625	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban	
4. Total # of Students : 48	5. # of Students Eligible for NSLP: 48
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 43.2
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: BIOLA MIGRANT HEAD START	
2. Entity Number: 16053140	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban	
4. Total # of Students : 25 12	5. # of Students Eligible for NSLP: 25 12
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 22.5
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: CHOWCHILLA HEAD START	
2. Entity Number: 16053097	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban Rural	
4. Total # of Students : 40 60	5. # of Students Eligible for NSLP: 40 60
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 36
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: COTTONWOOD HEAD START	
2. Entity Number: 16053098	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban	
4. Total # of Students : 20 30	5. # of Students Eligible for NSLP: 20 30
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 18
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: Casas De La Vina Sunset Head Start	
2. Entity Number: 16053095	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban Rural	
4. Total # of Students : 15 30	5. # of Students Eligible for NSLP: 15 30
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 13.5
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: EASTIN ARCOLA HEAD START	
2. Entity Number: 16054626	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban Rural	
4. Total # of Students : 67 20	5. # of Students Eligible for NSLP: 67 20
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 60.3
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: EASTSIDE	
2. Entity Number: 16053126	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban	
4. Total # of Students : 40 30	5. # of Students Eligible for NSLP: 40 30
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 36
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: FAIRMEAD HEAD START	
2. Entity Number: 16053128	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban Rural	
4. Total # of Students : 20 17	5. # of Students Eligible for NSLP: 20 17
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 18
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: FIREBAUGH MIGRANT HEAD START  
2. Entity Number: 16053143 NCES:  
New School Construction: N Administrative Entity N  
3. Urban or Rural: Urban Rural  
4. Total # of Students : 35 24 5. # of Students Eligible for NSLP: 35 24  
6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90% 8. Weighted Product for Calculating Share Discount (#4 \* #7): 31.5  
9. Entity Sub-Type: Head Start 10. Alt. Disc. Mech: N

1. Name of School: FIVE POINTS MIGRANT HEAD START  
2. Entity Number: 16053145 NCES:  
New School Construction: N Administrative Entity N  
3. Urban or Rural: Urban Rural  
4. Total # of Students : 25 16 5. # of Students Eligible for NSLP: 25 16  
6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90% 8. Weighted Product for Calculating Share Discount (#4 \* #7): 22.5  
9. Entity Sub-Type: Head Start 10. Alt. Disc. Mech: N

1. Name of School: HURON MIGRANT HEAD START  
2. Entity Number: 16053146 NCES:  
New School Construction: N Administrative Entity N  
3. Urban or Rural: Urban Rural  
4. Total # of Students : 39 20 5. # of Students Eligible for NSLP: 39 20  
6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90% 8. Weighted Product for Calculating Share Discount (#4 \* #7): 35.1  
9. Entity Sub-Type: Head Start 10. Alt. Disc. Mech: N

1. Name of School: ~~JULIA A LOPEZ CCDC - SAN PALOS HEAD START~~ DELETE SITE **NOT RECEIVING SERVICE**  
2. Entity Number: ~~16074147~~ NCES:  
New School Construction: ~~N~~ Administrative Entity N  
3. Urban or Rural: ~~Urban~~  
4. Total # of Students : ~~150~~ 5. # of Students Eligible for NSLP: ~~150~~  
6. %Students Eligible for NSLP (#5 / #4): ~~100.000%~~  
7. Discount % from Discount Matrix: ~~90%~~ 8. Weighted Product for Calculating Share Discount (#4 \* #7): ~~135~~  
9. Entity Sub-Type: ~~Head Start~~ 10. Alt. Disc. Mech: ~~N~~

1. Name of School: LOS NINOS HEAD START  
2. Entity Number: 16054629 NCES:  
New School Construction: N Administrative Entity N  
3. Urban or Rural: Urban  
4. Total # of Students : 28 20 5. # of Students Eligible for NSLP: 28 20

6. %Students Eligible for NSLP (#5 / #4): 100.000%	8. Weighted Product for Calculating Share Discount (#4 * #7): 25.2
7. Discount % from Discount Matrix: 90%	10. Alt. Disc. Mech: N
9. Entity Sub-Type: Head Start	

1. Name of School: MADERA MAIN OFFICE	NCES:
2. Entity Number: 16054630	Administrative Entity N
New School Construction: N	
3. Urban or Rural: Urban	
4. Total # of Students : 0	5. # of Students Eligible for NSLP: 0
6. %Students Eligible for NSLP (#5 / #4):	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 0
9. Entity Sub-Type:	10. Alt. Disc. Mech: N

1. Name of School: MARIPOSA HEAD START	NCES:
2. Entity Number: 16053132	Administrative Entity N
New School Construction: N	
3. Urban or Rural: Urban Rural	
4. Total # of Students : 20 30	5. # of Students Eligible for NSLP: 20 30
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 18
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: MEDEN ND OTA MIGRANT HEAD START	NCES:
2. Entity Number: 16053147	Administrative Entity N
New School Construction: N	
3. Urban or Rural: Urban Rural	
4. Total # of Students : 36 20	5. # of Students Eligible for NSLP: 36 20
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 32.4
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: MIS ANGELITOS	NCES:
2. Entity Number: 16057142	Administrative Entity N
New School Construction: N	
3. Urban or Rural: Urban	
4. Total # of Students : 32 24	5. # of Students Eligible for NSLP: 32 24
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 28.8
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: MIS TESOROS HEAD START	
2. Entity Number: 16053133	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban	
4. Total # of Students : 20 30	5. # of Students Eligible for NSLP: 20 30
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 18
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: <del>MOUNTAIN HEAD START</del> DELETE SITE <b><u>NOT RECEIVING SERVICE</u></b>	
2. Entity Number: 16074514	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban	
4. Total # of Students : 20	5. # of Students Eligible for NSLP: 20
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 18
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: NORTH FORK HEAD START	
2. Entity Number: 16053134	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban Rural	
4. Total # of Students : 17	5. # of Students Eligible for NSLP: 17
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 15.3
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: OAKHURST HEAD START	
2. Entity Number: 16053135	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban	
4. Total # of Students : 28 15	5. # of Students Eligible for NSLP: 28 15
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 25.2
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: ORANGE COVE MIGRANT HEAD START	
2. Entity Number: 16053150	NCES:
New School Construction: N	Administrative Entity N

3. Urban or Rural: ~~Urban~~ Rural  
4. Total # of Students : ~~33~~ 24  
5. # of Students Eligible for NSLP: ~~33~~ 24  
6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90%  
8. Weighted Product for Calculating Share Discount (#4 \* #7): 29.7  
9. Entity Sub-Type: Head Start  
10. Alt. Disc. Mech: N

1. Name of School: PARLIER MIGRANT HEAD START  
2. Entity Number: 16053153  
New School Construction: N  
NCES:  
Administrative Entity N  
3. Urban or Rural: Urban  
4. Total # of Students : ~~50~~ 36  
5. # of Students Eligible for NSLP: ~~50~~ 36  
6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90%  
8. Weighted Product for Calculating Share Discount (#4 \* #7): 45  
9. Entity Sub-Type: Head Start  
10. Alt. Disc. Mech: N

1. Name of School: POMONA HEAD START  
2. Entity Number: 16054627  
New School Construction: N  
NCES:  
Administrative Entity N  
3. Urban or Rural: ~~Urban~~ Rural  
4. Total # of Students : ~~38~~ 20  
5. # of Students Eligible for NSLP: ~~38~~ 20  
6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90%  
8. Weighted Product for Calculating Share Discount (#4 \* #7): 34.2  
9. Entity Sub-Type: Head Start  
10. Alt. Disc. Mech: N

1. Name of School: RAFAEL SILVA MIGRANT HEAD START  
2. Entity Number: 16074153  
New School Construction: N  
NCES:  
Administrative Entity N  
3. Urban or Rural: Urban  
4. Total # of Students : ~~36~~ 20  
5. # of Students Eligible for NSLP: ~~36~~ 20  
6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90%  
8. Weighted Product for Calculating Share Discount (#4 \* #7): 32.4  
9. Entity Sub-Type: Head Start  
10. Alt. Disc. Mech: N

1. Name of School: ~~REEDLEY~~ INEZ C. RODRIGUEZ MIGRANT AND SEASONAL HEAD START NAME CHANGE  
2. Entity Number: 16056617  
New School Construction: N  
NCES:  
Administrative Entity N  
3. Urban or Rural: Urban  
4. Total # of Students : ~~37~~ 24  
5. # of Students Eligible for NSLP: ~~37~~ 24

6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90%  
9. Entity Sub-Type: Head Start  
8. Weighted Product for Calculating Share Discount (#4 \* #7): 33.3  
10. Alt. Disc. Mech: N

1. Name of School: RUTH GONZALES HEAD START  
2. Entity Number: 16053137  
New School Construction: N  
3. Urban or Rural: Urban  
4. Total # of Students : 20 30  
6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90%  
9. Entity Sub-Type: Head Start  
NCES:  
Administrative Entity N  
5. # of Students Eligible for NSLP: 20 30  
8. Weighted Product for Calculating Share Discount (#4 \* #7): 18  
10. Alt. Disc. Mech: N

1. Name of School: SELMA MIGRANT HEAD START  
2. Entity Number: 16053154  
New School Construction: N  
3. Urban or Rural: Urban Rural  
4. Total # of Students : 50 32  
6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90%  
9. Entity Sub-Type:  
NCES:  
Administrative Entity N  
5. # of Students Eligible for NSLP: 50 32  
8. Weighted Product for Calculating Share Discount (#4 \* #7): 45  
10. Alt. Disc. Mech: N

1. Name of School: SIERRA VISTA HEAD START  
2. Entity Number: 16054628  
New School Construction: N  
3. Urban or Rural: Urban  
4. Total # of Students : 64 57  
6. %Students Eligible for NSLP (#5 / #4): 100.000%  
7. Discount % from Discount Matrix: 90%  
9. Entity Sub-Type: Head Start  
NCES:  
Administrative Entity N  
5. # of Students Eligible for NSLP: 64 57  
8. Weighted Product for Calculating Share Discount (#4 \* #7): 57.6  
10. Alt. Disc. Mech: N

1. Name of School: ~~SOUTH DOS PALOS HEAD START~~ DELETE SITE NOT RECEIVING SERVICE  
2. Entity Number: ~~16034890~~  
New School Construction: ~~N~~  
3. Urban or Rural: ~~Urban~~  
4. Total # of Students : ~~36~~  
6. %Students Eligible for NSLP (#5 / #4): ~~100.000%~~  
7. Discount % from Discount Matrix: ~~90%~~  
9. Entity Sub-Type: ~~Head Start~~  
NCES:  
Administrative Entity ~~N~~  
5. # of Students Eligible for NSLP: ~~36~~  
8. Weighted Product for Calculating Share Discount (#4 \* #7): ~~32.4~~  
10. Alt. Disc. Mech: ~~N~~

1. Name of School: VALLEY WEST HEAD START	
2. Entity Number: 16053138	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban	
4. Total # of Students : 30	5. # of Students Eligible for NSLP: 30
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 13.5
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

1. Name of School: VERDELL MCKELVEY HEAD START	
2. Entity Number: 16053139	NCES:
New School Construction: N	Administrative Entity N
3. Urban or Rural: Urban	
4. Total # of Students : 30	5. # of Students Eligible for NSLP: 30
6. %Students Eligible for NSLP (#5 / #4): 100.000%	
7. Discount % from Discount Matrix: 90%	8. Weighted Product for Calculating Share Discount (#4 * #7): 27
9. Entity Sub-Type: Head Start	10. Alt. Disc. Mech: N

Joseph J. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300    Fax - 732.946.8399  
[www.erategroup.com](http://www.erategroup.com)

# Exhibit V

**From:** Donna Tooley <dtooley@maderacap.org>  
**To:** Katherine M. Weiss <kweiss@erategroup.com>  
**Sent:** Friday, March 21, 2014 6:51 PM  
**Subject:** RE: Information Request Community Partnership of Madera - 880246

Hello Katherine,

The Madera Main Office was omitted from the listing below. It is entity number 16054630. Also, Reedley Migrant Head Start had a name change in 2011. Its current name is Inez C. Rodriguez Migrant and Seasonal Head Start. Additionally, the Mendota Migrant Head Start is misspelled on your form.

Other than these omissions and corrections, the information is correct.

Thank you,

Donna Tooley  
Chief Financial Officer  
Community Action Partnership of Madera County, Inc.  
1225 Gill Avenue  
Madera, CA 93637  
(559) 675-5755 Direct  
(559) 673-7665 FAX  
[dtooley@maderacap.org](mailto:dtooley@maderacap.org)

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**From:** Katherine M. Weiss [mailto:kweiss@erategroup.com]  
**Sent:** Friday, March 21, 2014 3:20 PM  
**To:** Donna Tooley  
**Subject:** Re: Information Request Community Partnership of Madera - 880246

Please confirm that the below response is correct.

Katherine M. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 732.946.8399  
[www.erategroup.com](http://www.erategroup.com)

----- Forwarded Message -----

**From:** Katherine M. Weiss <kweiss@erategroup.com>  
**To:** "Tarantino, Gary" <Gary.TARANTINO@sl.universalservice.org>

Sent: Friday, March 14, 2014 8:21 AM

Subject: Re: Information Request 3-13-14 Community Partnership of Madera - 880246

## ANSWERS BELOW

### *Issue*

Based on the review of your Funding Year **2013** FCC Form 471 application **880246**, we have determined that the entities listed below that are included in your request for services appear to be Head Start facilities. In your state, facilities dedicated to Head Start instruction are eligible for funding. However, services for children under the age of **three** are not eligible for discounts in your state.

For further information regarding Head Start facilities, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/non-traditional/default.aspx>.

Listed below are the Head Start facilities:

Entity
Casas De La Vina Sunset Head Start
CHOWCHILLA HEAD START
COTTONWOOD HEAD START
EASTSIDE
FAIRMEAD HEAD START
MARIPOSA HEAD START
MIS TESOROS HEAD START
NORTH FORK HEAD START
OAKHURST HEAD START
RUTH GONZALES HEAD START
VALLEY WEST HEAD START
VERDELL MCKELVEY HEAD START
BIOLA MIGRANT HEAD START
FIREBAUGH MIGRANT HEAD START
FIVE POINTS MIGRANT HEAD START
HURON MIGRANT HEAD START
MEDNOTA MIGRANT HEAD START
ORANGE COVE MIGRANT HEAD START
PARLIER MIGRANT HEAD START
SELMA MIGRANT HEAD START
EASTIN ARCOLA HEAD START
POMONA HEAD START
SIERRA VISTA HEAD START
LOS NINOS HEAD START
REEDLEY MIGRANT AND SEASONAL HEAD START
MIS ANGELITOS
RAFAEL SILVA MIGRANT HEAD START

*Questions*

**PLEASE NOTE: We need a response for each of the schools listed above. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.**

To assist us in the review of your application, we need the following information regarding services for children under the age of 3

To assist us in the review of your application, we need the following information regarding services for children under the age of **three**:

1. Does the facility(ies) listed above include Head Start students? **YES**
  - a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Facility**
2. Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.
  - a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under 3 as per REVISED BLOCK 4**
  - b. If Yes, provide the enrollment count of students under the age of 3.
3. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See REVISED BLOCK 4/5**
4. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See REVISED BLOCK 4/5**
  - a. Identify the ineligible student cost (students under the age of 3)
  - b. Identify the eligible student cost
5. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.

Let me know if you need anything else.

Katherine M. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 888.429.5749  
[www.erategroup.com](http://www.erategroup.com)

Exh.b.7 VI

**Subject:** Fw: FY2013 FCC Form 471 881716 Appeal – Response due 3/21/2014  
**From:** Joseph Weiss (jweiss@erategroup.com)  
**To:** Frank.JONES@sl.universalservice.org;  
**Date:** Friday, March 7, 2014 9:25 AM

Please call me on this

Joseph J. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 732.946.8399  
[www.erategroup.com](http://www.erategroup.com)

----- Forwarded Message -----

**From:** Katherine M. Weiss <kweiss@erategroup.com>  
**To:** Frank Jones <Frank.JONES@sl.universalservice.org>  
**Cc:** "Wesley.WOODMAN@sl.universalservice.org" <Wesley.WOODMAN@sl.universalservice.org>  
**Sent:** Thursday, March 6, 2014 11:57 AM  
**Subject:** Fw: FY2013 FCC Form 471 881716 Appeal - Response due 3/21/2014

We recently received the enclosed letter and responded accordingly with an LOA.

The review is telling me that the response has to come from the school.

Please advise

Joseph J. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 732.946.8399  
[www.erategroup.com](http://www.erategroup.com)

----- Forwarded Message -----

**From:** "Woodman, Wesley" <Wesley.WOODMAN@sl.universalservice.org>  
**To:** "kweiss@erategroup.com" <kweiss@erategroup.com>  
**Cc:** "JosephWeiss@17329468399" <IMCEAFAX-+27JosephWeiss+4017329468399+27@solixinc.com>  
**Sent:** Thursday, March 6, 2014 11:51 AM  
**Subject:** FY2013 FCC Form 471 881716 Appeal - Response due 3/21/2014

Joseph Weiss,

Please review the attached letter regarding the appeal of FCC Form 471, 881716, and provide your responses per the requirements in the letter.

Thank you.

Wes Woodman  
Associate Manager, Program Compliance  
30 Lanidex Plaza West | Parsippany, NJ 07054  
T: 973.581.5066 | F: 973.599.6525  
[wwoodma@sl.universalservice.org](mailto:wwoodma@sl.universalservice.org)

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Exhibit VII

Subject: Re: E-rate FCC Form 471 App# 882566  
From: Katherine M. Weiss (kweiss@erategroup.com)  
To: Charles.HALL@sl.universalservice.org;  
Cc: kweiss@erategroup.com;  
Date: Wednesday, November 6, 2013 10:49 PM

## ANSWERS BELOW

### I. Issue

Based on the review of your Funding Year **2013** FCC Form 471 application **882566**, we have determined that the entity(ies) listed below that are included in your request for services appear to be Head Start facility(ies).

In your state, Head Start services can be eligible for Head Start student populations, if the following conditions are met:

- The entity is part of a public school district, OR
- The entity is a stand-alone Head Start facility recognized by the state (for applicable states), OR

For further information regarding Head Start facilities, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/non-traditional/default.aspx>.

Listed below are the ineligible Head Start facility(ies):

Entity
ST. NICHOLAS CENTER #1
ST. NICHOLAS CENTER #2/186TH STREET

### Questions

To assist us in the review of your application, we need the following information:

1. Provide third party documentation (i.e., documentation from your State Department of Education) demonstrating that the entities above meet Head Start requirements for your state.

### SITES ARE LISTED ON USAC SITE FOR NY HEAD START

To assist us in the review of your application, we need the following information regarding services for children under the age of **three**:

1. Does the facility(ies) listed above include Head Start students? **YES**
  - a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Facility**

2. Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.
  - a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under 3**
  - b. If Yes, provide the enrollment count of students under the age of 3.
3. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See Block 4/5**
4. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See Block 4/5**
  - a. Identify the ineligible student cost (students under the age of 3)
  - b. Identify the eligible student cost
5. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.

Let me know if you need anything else.

Katherine M. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 888.429.5749  
[www.erategroup.com](http://www.erategroup.com)

---

**From:** "Hall, Charles" <Charles.HALL@sl.universalservice.org>  
**To:** "'Katherine Weiss@1-732-9468399'" <IMCEAFAX-Katherine+20Weiss+401-732-9468399@solixinc.com>  
**Cc:** "kweiss@erategroup.com" <kweiss@erategroup.com>; "Joseph Weiss (jweiss@erategroup.com)" <jweiss@erategroup.com>  
**Sent:** Wednesday, November 6, 2013 10:28 PM  
**Subject:** E-rate FCC Form 471 App# 882566

Please see attached.

Charles Hall  
Associate Manager, Program Integrity Assurance  
30 Lanidex Plaza West | Parsippany, NJ 07054  
T: 973.581.5179 | F: 973.599.6579  
[chhall@sl.universalservice.org](mailto:chhall@sl.universalservice.org)

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Subject: Re: E-rate FCC Form 471 App# 882564  
From: Katherine M. Weiss (kweiss@erategroup.com)  
To: Charles.HALL@sl.universalservice.org;  
Date: Wednesday, November 6, 2013 10:57 PM

## ANSWERS BELOW

### Eligibility of the Entities

#### I. Issue

Based on the review of your Funding Year **2013** FCC Form 471 application **882564**, we have determined that the entity(ies) listed below that are included in your request for services appear to be Head Start facility(ies). In your state, facilities dedicated to Head Start instruction are eligible for funding. However, services for children under the age of **3** are not eligible for discounts in your state.

For further information regarding Head Start facilities, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/non-traditional/default.aspx>.

Listed below are the ineligible Head Start facility(ies):

Entity
EAST HARLEM BILINGUAL HEAD START (SITE I)
EAST HARLEM HEAD START
EAST HARLEM BILINGUAL HEAD START (SITE II)

#### Questions

To assist us in the review of your application, we need the following information regarding services for children under the age of **3**:

To assist us in the review of your application, we need the following information regarding services for children under the age of **three**:

1. Does the facility(ies) listed above include Head Start students? **YES**
  - a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Facility**
2. Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.
  - a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under 3**
  - b. If Yes, provide the enrollment count of students under the age of 3.
3. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See Block 4/5**
4. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See Block 4/5**
  - a. Identify the ineligible student cost (students under the age of 3)
  - b. Identify the eligible student cost

5. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.

Let me know if you need anything else.

Katherine M. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 888.429.5749  
[www.erategroup.com](http://www.erategroup.com)

---

**From:** "Hall, Charles" <Charles.HALL@sl.universalservice.org>  
**To:** "'Katherine Weiss@1-732-9468399'" <IMCEAFAX-Katherine+20Weiss+401-732-9468399@solixinc.com>  
**Cc:** "kweiss@erategroup.com" <kweiss@erategroup.com>; "Joseph Weiss (jweiss@erategroup.com)" <jweiss@erategroup.com>  
**Sent:** Wednesday, November 6, 2013 10:15 PM  
**Subject:** E-rate FCC Form 471 App# 882564

Please see attached.

Charles Hall  
Associate Manager, Program Integrity Assurance  
30 Lanidex Plaza West | Parsippany, NJ 07054  
T: 973.581.5179 | F: 973.599.6579  
[chhall@sl.universalservice.org](mailto:chhall@sl.universalservice.org)

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Subject: Re: Erate App# 882385 Abysinnian

From: Katherine M. Weiss (kweiss@erategroup.com)

To: Karen.HEALD@sl.universalservice.org;

Date: Thursday, October 3, 2013 7:47 PM

## ANSWERS ENCLOSED

### I. Eligibility of the Entities

#### *Issue*

Based on the review of your Funding Year 2013 FCC Form 471 application **#882385**, we have determined that the entity(ies) listed below that are included in your request for services appear to be Head Start facility(ies). In your state, facilities dedicated to Head Start instruction are eligible for funding. However, services for children under the age of **three** are not eligible for discounts in your state.

For further information regarding Head Start facilities, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/non-traditional/default.aspx>.

Listed below are the ineligible Head Start facility(ies):

Entity
ANNIE G. NEWSOME HEAD START I
ANNIE G. NEWSOME HEAD START II
ABYSSINIAN/ADAM CLAYTON POWELL CENTER

#### *Questions*

To assist us in the review of your application, we need the following information regarding services for children under the age of **three**:

1. Does the facility(ies) listed above include Head Start students? **YES**
  - a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Facility**
2. Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.
  - a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under 3**
  - b. If Yes, provide the enrollment count of students under the age of 3.
3. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See Block 4/5**
4. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See Block 4/5**
  - a. Identify the ineligible student cost (students under the age of 3)
  - b. Identify the eligible student cost
5. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.

## II. Eligibility of Products or Services

### *Issue*

Based on the review of your Funding Year 2013 FCC Form 471 #882385 for FRN # 2404665, your Item 21 Attachment was not sufficient to allow us to determine the eligibility of your request.

### *Questions*

To assist us in the review of your application, we need the following information:

1. Vendor documentation which supports the funding request amount of \$9,150.00/month.

See enclosed

Let me know if you need anything else

Katherine M Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 888.429.5749  
[www.erategroup.com](http://www.erategroup.com)

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**From:** "Heald, Karen" <Karen.HEALD@sl.universalservice.org>  
**To:** "'kweiss@erategroup.com'" <kweiss@erategroup.com>  
**Sent:** Wednesday, September 25, 2013 1:55 PM  
**Subject:** Erate App# 882385

Please see the attached.

Thanks,

Karen

Karen J. Heald  
Associate Manager, Program Integrity Assurance  
30 Lanidex Plaza West | Parsippany, NJ 07054  
T: 973.581.7578 | F: 973.599.6579  
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